

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

GROUP ART UNIT 2851

EXAMINER: Liu, Michael

APPELLANT: Coppola, Roman

SERIAL NO. 10/568656

FILED: February 15, 2006

FOR: Inflatable photographic structure

ART UNIT: 2851

MS Appeal Brief - Patents
Commissioner of Patents and Trademarks
Washington, D.C. 20231
Attention: Board of Patent Appeals and Interferences

APPELLANT'S BRIEF UNDER 37 CFR § 41.37

The Applicant filed a notice of appeal on February 27, 2008, and its opening brief on March 26, 2008 in response to the Final Office Action issued on December 14, 2007. In response, the Examiner reopened prosecution and issued a non-final office action on April 25, 2008.

The Applicant filed a new appeal brief on July 25, 2008, but the Examiner again reopened prosecution and issued a non-final office action on October 15, 2008.

This latest appeal is from that latest office action. The Applicant maintains that the Examiner is acting inappropriately by repeatedly rejecting the pending claims on unsupportable grounds, and thereby improperly forcing the Applicant to appeal improper rejections. The Applicant requests the previously paid appeal fees under 37 C.F.R. 41.20 be applied to the present appeal. Any additional fees are dealt with in the accompanying TRANSMITTAL OF APPEAL BRIEF.

This brief contains the following items under the headings in the order here indicated:

- I. Real Party in Interest
- II. Related Appeals and Interferences

- III. Status of Claims
- IV. Status of Amendments
- V. Summary of Claimed Subject Matter
- VI. Grounds of Rejection to be Reviewed on Appeal
- VII. Argument
- VIII. Claims Appendix
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I. Real Party in Interest

The real party in interest is Roman Coppola.

II. Related Appeals and Interferences

There are no other appeals or interferences in this matter known to appellant.

III. Status of Claims

- 1. Claims pending: 1, 4, 6-13, and 19-23;
- 2. Claims withdrawn: none;
- 3. Claims canceled: 2-3, 5, and 14-18;
- 4. Claims rejected: 1, 4, 6-13, and 19-23;
- 5. Claims objected to: none;
- 6. Claims allowed: none; and
- 7. Claims on appeal: 1, 4, 6-13, and 19-23.

IV. Status of Amendments

The claims were rejected in the final Office action mailed December 14, 2007 based on amendments entered in response to non-final Office action mailed June 15, 2007. The Applicant filed a notice of appeal on February 27, 2008, and its opening brief on March 26, 2008 in response to the December 14, 2007, Final Office action. In response, the Examiner reopened prosecution on April 25, 2008, to which the Applicant filed a new appeal brief on July 25, 2008. Once again the Examiner reopened prosecution on October 15, 2008, and the Applicant is again requesting reinstatement of the appeal. No claim amendments been made since the issuance of the Final Office action on December 14, 2007, therefore, section IX recites the claims as currently entered/pending.

V. Summary of Claimed Subject Matter

A) Independent claim 1 recites a photographic system, comprising:

- a) An inflatable structure (Spec. page 3/L2-4) that defines a cavity sufficiently large to contain a plurality of people, props, and equipment (Spec. page 3/L30-32 and FIGS. 1-2, numeral 100 and 200, respectively); and
- b) wherein the structure comprises a translucent wall (Spec. page 3/L13-25) that is colored to produce a uniform chroma key colored backdrop (Spec. page 4/L10-24) to a subject being photographed from inside the cavity (Spec. page 6/L21-24, and FIG.2).

B) Independent claim 19 recites a photographic method, comprising:

- a) providing an inflatable structure that defines a cavity (Spec. page 3/L2-4, and FIGS 1-3; and also Spec. page 7/L3-15 and FIG. 4) having a wall colored to produce a chroma key colored background (Spec. page 4/L10-24; and also Spec. page 7/L3-11 and FIG 4);
- b) positioning a camera and a subject inside the cavity (Spec. page 7/L16-26 and FIG. 4);

- c) illuminating the subject with artificial lighting transmitted through the wall (Spec. page 5/L16-22 and Spec. page 7/L5-6); and
- d) photographing the thus illuminated subject against the background from the inside of the cavity (Spec. page 7/L4-32).

VI. Grounds of Rejection to be Reviewed On Appeal

- A. Rejection of claims 1 and 6-8 under 35 U.S.C. 102(b) as being anticipated by Leary (US 6,061,969), or in the alternative, claims 1, 6-8, 10, and 11 under 35 U.S.C. 103(a) as being obvious over Leary as evidenced by Oles (US 5,946,500).
- B. Rejection of claim 4 under 35 U.S.C. 103(a) as being unpatentable over Leary in view of Huebner (US 6,343,184).
- C. Rejection of claim 9 under 35 U.S.C. 103(a) as being unpatentable over Leary in view of Siemens (US 6,282,842).
- D. Rejection of claims 12 and 13 under 35 U.S.C. 103(a) as being unpatentable over Leary in view of Sadler (4,164,829).
- E. Rejection of claims 19, 20, and 22 under 35 U.S.C. 103(a) as being unpatentable over Leary in view of Oles and further in view of Huebner.
- F. Rejection of claim 21 under 35 U.S.C. 103(a) as being unpatentable over Leary as combined as applied to claim 19, and further in view of Aptekar (US 2005/0144018).
- G. Rejection of claim 23 under 35 U.S.C. 103(a) as being unpatentable over Leary as combined as applied to claim 19, and further in view of Sadler.

VII. ARGUMENT

A. Rejection of claims 1 and 6-8 under 35 U.S.C. 102(b) as being anticipated by Leary (US 6,061,969), or in the alternative, claims 1, 6-8, 10, and 11 under 35 U.S.C. 103(a) as being obvious over Leary as evidenced by Oles (US 5,946,500).

The Office's anticipation rejection of claims 1 and 6-8 under 35 USC 102(b) over Leary should be withdrawn. In this case, the Office failed to properly establish that independent claim 1 is anticipated by Leary, since Leary fails to teach each and every element of claim 1.

It is well established that anticipation under 35 U.S.C. § 102 requires the presence in a single prior art reference, either expressly or inherently, disclosure of each and every element of the claimed invention. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). In addition, to the single prior art reference disclosing each and every element of the claimed invention, the anticipatory reference must also be sufficiently enabling to place the information in possession of the public. *Astra Aktiebolag v. Andrx Pharms., Inc.*, 483 F.3d 1364, 1378 (Fed. Cir. 2007); *Minnesota Mining & Manufacturing Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 1572 (Fed. Cir. 1992); *Scipps Clinic & Research Foundation v. Genentech, Inc.*, 927 F.2d 1565, 1578 (Fed. Cir. 1991).

In this case, claim 1 recites a photographic system having, *inter alia*, the following limitations: (1) an inflatable structure that defines a cavity sufficiently large to contain a plurality of people, props, and equipment; and (2) wherein the structure comprises a translucent wall that is colored to produce a uniform chroma key colored backdrop to a subject being photographed from inside the cavity. Thus, claim 1 requires the Office to find a single prior art reference that teaches, either expressly or inherently, the above limitations. To date, the Office has failed to provide such a showing.

The Office argues that Leary teaches an inflatable structure containing all of the structural limitations of the independent claim 1. (October 15, 2008, Office Action, at 3.) In support of this position the Office argues that the limitation "to produce a uniform chroma key colored backdrop ..." is merely a recitation of an intended use, rather than a structural feature of the claimed photographic system, and thus Leary's wall satisfies the intended use and hence anticipates independent claim 1. (*Id.*) This argument is specious. The fact is that the limitation

“wherein the structure comprises a translucent wall that is colored to produce a uniform chroma key colored backdrop ...” is a structural limitation. If Coppola’s translucent wall is not colored to produce to a uniform chroma key colored backdrop, the structure is inoperable for use in chroma replacement.

Specifically, with regards to limitation (2) above, the Office relies on the words, “translucent” (Leary spec., at C2:L38-39) and “pigmented” (Id. at C5:L62) in Leary to stand for the proposition that Leary’s wall is colored to form a uniform chroma key colored backdrop. (*Id.* at C5:L62.) Although Leary contemplates that the wall may be pigmented that is not what is claimed. What is claimed is a translucent wall that is “colored to produce a uniform chroma key colored backdrop.” A chroma key color is a color that is “suitable for use in a background replacement method.” (Coppola Spec. page 4, 1st full paragraph.) Such replacement methods look at the luminescence of a particular color, that is, everything over (or under) a set brightness level is keyed out and replaced by another image. Thus, a chroma key colored backdrop is a colored backdrop that has particular qualities that enable it to be used in a background replacement method. Consequently, it should be understood that Coppola’s chroma key color is not a subset of Leary’s pigment, but is entirely inconsistent with Leary’s pigment.

Leary contemplates that the wall of the inflatable green house may be either (1) translucent when the greenhouse is intended to be used for photosynthetic plants, or (2) light filtering or opaque (presumably pigmented) when the greenhouse is to be used for light sensitive plants. (Leary spec., at C5:L33-63). Leary’s motivation to use a pigmented wall is to control the degree of light transmission into the structure. Whereas Coppola’s wall is both translucent to allow light transmission to cast a softer shadow on the subject being photographed (Coppola spec., at 3.) and also is colored to produce a uniform chroma key colored backdrop to provide a suitable backdrop for the background replacement method. There is absolutely no teaching in Leary to use a wall that is translucent and also one that is colored to produce a uniform chroma key colored backdrop.

Still further, Leary’s translucent wall is not suitable (and hence not enabling as evidenced by Oles) for use as a uniform chroma key colored backdrop. As currently claimed, Coppola requires that the translucent wall be colored to produce a “uniform ... backdrop.” In the

specification, it is pointed out that “the background can be re-textured so that the surface texture is substantially the same over the entire surface,” and “seams detract from the uniformity of the background and therefore fewer seams are preferred especially in areas that are likely to be captured by the camera.” (Coppola Spec., page 4, at L21-24.) The biggest challenge when setting up a blue-screen or green-screen is even lighting and the avoidance of shadow, because it is necessary to have as narrow a color range as possible to allow chroma replacement. Hence, surface irregularities of the background, such as uneven texture, shadowing, or surface indentations would cause the backdrop to be unsuitable for use in chroma replacement. In deed, Leary discloses that “the outer wall 34 and inner wall 36 (see Leary FIG. 3) ... are spot welded together at numerous points throughout the walls in a pattern which lends to the structural rigidity of the greenhouse 10 when inflated.” (Leary Spec. at C4:L12-17.) As a result of these surface irregularities, Leary’s wall is not suitable for use with chroma replacement. Thus, Leary fails to meet each and every limitation of independent claim 1 and is not a proper anticipation reference.

The Office’s alternative obviousness rejection of claims 1, 6-8, 10, and 11 under 35 USC 103(a) over Leary as evidenced by Oles should also be withdrawn. In this case, the Office failed to establish a *prima facie* showing of obviousness because there is no teaching, suggestion, or motivation in Leary as evidenced by Oles to practice a photographic system as currently claimed in independent claim 1.

It is well recognized that the factual inquiry whether to combine references must be based on objective evidence of record. See, e.g., *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120, 1124-25, 56 USPQ2d 1456, 1459 (Fed. Cir. 2000) (“a showing of a suggestion, teaching, or motivation to combine the prior art references is an ‘essential component of an obviousness holding’”). The courts have held that “...teachings of references can be combined only if there is some suggestion or incentive to do so.” (quoting *ACS Hosp. Sys., Inc. v. Montefiore Hosp.*, 732 F.2d 1572, 1577 (Fed. Cir. 1984)). Indeed, particular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed (see, e.g., *In re Kotzab*, 217 F.3d 1365, 1371 (Fed. Cir. 2000)). Thus, the Office can satisfy the burden of showing obviousness of the combination only by showing some objective teaching in the prior art or that

knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references. *In re Fritch*, 972 F.2d 1260, 1265 (Fed. Cir. 1992).

The Office cites Oles as evidencing the Examiner's position that any solid colored background can be used for the chroma key background. The Office states that so long as a background is comprised of a uniform solid color it can be utilized for chroma key replacement. (October 15, 2008, Office Action, at 5.) This position is specious, since a surface that is comprised of uniform solid color and that contains many surface irregularities or excessive shadowing is not suitable for use with chroma replacement, as discussed above.

The Office's stated rationale for its obviousness rejection over Leary as evidenced by Oles is that, "it would have been obvious to one of ordinary skill in the art to utilize the pigmented dome of Leary as a solid colored background for chroma replacement to photograph subjects, as evidence provided by Oles. (October 15, 2008, Office Action, at 5.) However, this mere conclusory statement is simply not sufficient to support the present obviousness rejection. In fact, Oles never mentions anything about using the device with an inflatable structure for the purpose of providing a portable, temporary and inexpensive photographic system. Moreover, there is not one iota of indication in Leary that the wall of the inflatable structure could be used as a backdrop for chroma replacement (see argument *infra*). The Federal Circuit has stated that "rejections on obviousness cannot be sustained with mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006). What the Office is doing here is exactly what the Court in *Kahn* warned against.

In sum, a person or ordinary skill in the art would not have been motivated to use Leary's wall as evidenced by Oles because Leary's wall would simply not work for chroma replacement. Oles works just fine without using an inflatable structure. And Leary's device apparently works just fine, without a wall that is colored to produce a uniform chroma key colored backdrop. As such, Leary as evidenced by Oles fail to teach, suggest or motivate a person of ordinary skill in the art to use Leary's wall for chroma replacement. This is critical, because the Office has the initial burden to show a teaching, suggestion, or motivation to combine. The burden only shifts

to the Applicant once the Examiner's burden has been satisfied. In this case, the Office failed to meet the initial burden of showing a teaching, suggestion, or motivation to combine Oles with Leary. Thus, the Office is using impermissible hindsight to combine specific elements from completely different references, to produce a combination for which there is absolutely no teaching, suggestion, or motivation.

Claims 6-8, 10 and 11 are all allowable (among other things) by virtue of their dependency upon allowable claim 1.

B. Rejection Of Claim 4 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary In View Of Huebner (US 6,343,184)

Here again, the rejection of claim 4 should be withdrawn since the Office failed to establish a *prima facie* showing of obviousness with respect to Leary as evidenced by Oles.

As discussed above, Leary fails to provide the requisite teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 1. Similarly, Huebner adds nothing further to the analysis. Huebner fails to provide any teaching, suggestion, or motivation to a person skilled in the art to utilize, a photographic system having, *inter alia*, an inflatable structure with a wall colored to produce a uniform chroma key colored backdrop. Still further, the Office failed to cite any common knowledge that could be combined with the combination of Leary and Huebner to practice the invention as recited in independent claim 1. Thus, the combination of Leary and Huebner does not render claim 1 obvious. Moreover, claim 4 is dependent upon allowable claim 1, and it is logically impossible for claim 4 to be obvious when claim 1 is allowable. As such the rejection of claim 4 should be withdrawn.

C. Rejection Of Claim 9 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary In View Of Simens (US 6,282,842)

Again, the Office failed to establish a *prima facie* showing of obviousness with respect to the rejection of claim 9 over Leary as evidenced by Oles. As discussed above, Leary fails to provide the requisite teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 1. Similarly, Simens adds nothing further to the analysis. Simens fails to provide any teaching, suggestion, or

motivation to a person skilled in the art to utilize, a photographic system having, *inter alia*, an inflatable structure with a wall colored to produce a uniform chroma key colored backdrop. Still further, the Office failed to cite any common knowledge that could be combined with the combination of Leary and Simens to practice the invention as recited in independent claim 1. Thus, the combination of Leary and Simens does not render claim 1 obvious. Moreover, claim 9 is dependent upon allowable claim 1, and it is logically impossible for claim 9 to be obvious when claim 1 is allowable. As such the rejection of claim 9 should be withdrawn.

D. Rejection Of Claims 12 And 13 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary In View Of Sadler (4,164,829)

Yet again, the Office failed to establish a *prima facie* showing of obviousness with respect to the rejection of claims 12 and 13.

As discussed above, Leary as evidenced by Oles fails to provide any teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 1. Similarly, Sadler adds nothing further to the analysis.

Notably, Sadler fails to teach (1) a translucent wall (2) that is colored to produce a uniform chroma key colored backdrop, as claimed in independent claim 1. Instead, Sadler teaches that the wall of the structure has two layers that are opaque. *Id.* at C2:L35-45. Specifically, Sadler discloses that the “first layer which faces into the interior of the structure has a white surface, while the second layer has a black surface, the overall material being opaque.” *Id.* In fact, Sadler not only fails to expressly disclose a translucent wall, but also fails to inherently disclose a translucent wall. In this case, a person of ordinary skill in the art would not recognize that a translucent wall is inherently contained in Sadler. Sadler’s motivation to use an opaque wall is to provide an inner surface that is suitable for image projection, rather than to provide a wall that is suitable for background replacement, and also one that is capable of allowing transmission of light from the exterior (to reduce shadowing problems inherent with direct lighting). Consequently, Sadler teaches away from using a translucent wall, and as a result a person skilled in the art would not expect Sadler’s inner wall to be suitable for use in background replacement.

Thus, Sadler also fails to provide a teaching, suggestion, or motivation to a person skilled in the art to utilize, a photographic system having, *inter alia*, an inflatable structure with a wall colored to produce a uniform chroma key colored backdrop. Moreover, the Office failed to cite any common knowledge that could be combined with the combination of Leary and Sadler to practice the invention as recited in independent claim 1. Thus, the combination of Leary and Sadler does not render claim 1 obvious.

Claims 12 and 13 are dependent upon allowable claim 1, and it is logically impossible for claims 12 and 13 to be obvious when claim 1 is allowable. As such the rejection of claims 12 and 13 should be withdrawn.

E. Rejection Of Claims 19, 20, And 22 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary In View Of Oles And Further In View Of Huebner

The rejection of claims 19, 20, and 22 should also be withdrawn for the reasons discussed above, with respect to the rejection of claim 1 over Leary as evidenced by Oles.

In this case, claim 19 recites a photographic method comprising, *inter alia*, “providing an inflatable structure that defines a cavity having a wall colored to produce a chroma key colored background ... and illuminating the subject with artificial lighting transmitted through the wall.”

As discussed above, the combination of Leary as evidenced by Oles fails to provide a teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 1. The same is true for claim 19. Huebner fails to provide any teaching, suggestion, or motivation to a person skilled in the art to utilize, a photographic system having, *inter alia*, an inflatable structure having a wall colored to produce a chroma key colored backdrop. Again, the Office failed to cite any common knowledge that could be combined with the combination of Leary, Oles, and Huebner to practice the invention as recited in independent claim 19. Thus, the combination of Leary, Oles, and Huebner does not render the claimed invention obvious as recited in independent claim 19. As such the rejection of claim 19 should withdrawn.

Claims 20 and 22 are all allowable (among other things) by virtue of their dependency upon allowable claim 19.

F. Rejection Of Claim 21 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary As Combined As Applied To Claim 19, And Further In View Of Aptekar (US 2005/0144018).

Again, the Office failed to establish a *prima facie* showing of obviousness with respect to the rejection of claim 21 under 35 U.S.C. 103(a) as being unpatentable over Leary as combined as applied to claim 19, and in further view of Aptekar.

As discussed above, the combination of Leary, Oles, and Huebner fails to provide a teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 19. Similarly, Aptekar adds nothing further to the analysis. Aptekar fails to provide any teaching, suggestion, or motivation to a person skilled in the art to utilize, a photographic system having, *inter alia*, an inflatable structure having a wall colored to produce a chroma key colored backdrop. Still further, the Office failed to cite any common knowledge that could be combined with the combination of Leary, Oles, Huebner, and Aptekar to practice the invention as recited in independent claim 19. Thus, the combination of Leary, Oles, Huebner, and Aptekar does not render the claimed invention obvious as recited in independent claim 19. Moreover, claim 21 is dependent upon allowable claim 19, and it is logically impossible for claim 21 to be obvious when claim 19 is allowable. As such the rejection of claim 21 should withdrawn.

G. Rejection Of Claim 23 Under 35 U.S.C. 103(A) As Being Unpatentable Over Leary As Combined As Applied To Claim 19, And Further In View Of Sadler.

Yet again, the Office failed to establish a *prima facie* showing of obviousness with respect to the rejection of claim 23 under 35 U.S.C. 103(a) as being unpatentable over Leary as combined as applied to claim 19, and in further view of Sadler.

As discussed above, the combination of Leary, Oles, and Huebner fails to provide a teaching, suggestion, or motivation that would have led one of ordinary skill in the art to practice a photographic system as recited in independent claim 19. Similarly, Sadler adds nothing further to the analysis. As discussed above, Sadler teaches away from using a translucent wall (i.e. illuminating the subject with artificial lighting transmitted through the wall). As a result a person skilled in the art would not expect that Sadler's inner wall is suitable for use in background

replacement. Thus, Sadler fails to provide any teaching, suggestion, or motivation to a person skilled in the art to utilize a wall colored to produce a chroma key colored background. Still further, the Office failed to cite any common knowledge that could be combined with the combination of Leary, Oles, Huebner, and Sadler to practice the invention as recited in independent claim 19. Thus, the combination of Leary, Oles, Huebner, and Sadler does not render the claimed invention obvious as recited in independent claim 19. Moreover, claim 23 is dependent upon allowable claim 19, and it is logically impossible for claim 23 to be obvious when claim 19 is allowable. As such the rejection of claim 23 should be withdrawn.

CONCLUSION

In its repeated rejections, the Office never set forth a proper showing of anticipation or obviousness. In deed none of the cited art, alone or in any combination, teaches, suggests or motivates one of ordinary skill in the art to satisfy all the limitations of the independent claims. Thus, the rejections should be withdrawn.

Respectfully submitted,
Fish & Associates, PC

Date: January 14, 2009

By: /Robert D. Fish/
Robert D. Fish
Reg. No. 33880

Fish & Associates, PC
2603 Main Street, Suite 1050
Irvine, CA 92614-6232
Telephone (949) 253-0944
Fax (949) 253-9069

VIII. Claims Appendix

1. A photographic system, comprising:
 - an inflatable structure that defines a cavity sufficiently large to contain a plurality of people, props, and equipment; and
 - wherein the structure comprises a translucent wall that is colored to produce a uniform chroma key colored backdrop to a subject being photographed from inside the cavity.
- 2-3. (Cancelled)
4. The system of claim 1, further comprising a plurality of stage lights that illuminate the cavity from outside the structure.
5. (Cancelled)
6. The system of claim 1, wherein the inflatable structure is comprised of a plastic sheet.
7. The system of claim 6, wherein the plastic sheet is a vinyl.
8. The system of claim 7, wherein the vinyl has a thickness of at least 4 mils.
9. The system of claim 1, wherein the inflatable structure has a floor area of more than 20,000 sq. ft.
10. The system of claim 1, wherein the chroma key color is blue.
11. The system of claim 1, wherein the chroma key color is green.
12. The system of claim 1, wherein the inflatable structure has a floor portion that is continuous with the wall.
13. The system of claim 1, wherein the structure is inflated by pressurizing the cavity.
- 14-18. (cancelled)
19. A photographic method, comprising:

providing an inflatable structure that defines a cavity having a wall colored to produce a chroma key colored background;
positioning a camera and a subject inside the cavity;
illuminating the subject with artificial lighting transmitted through the wall; and
photographing the thus illuminated subject against the background from the inside of the cavity.

20. The method of claim 19, wherein the subject comprises a person.
21. The method of claim 19, wherein the subject comprises a car.
22. The method of claim 19, further comprising positioning at least some photography-related equipment inside the cavity, and operating the equipment from outside the cavity.
23. The method of claim 19, wherein the step of providing the structure further comprises providing a floor portion that is an extension of the wall.

IX. Evidence Appendix

No evidence was submitted pursuant to §§ 1.130, 1.131, or 1.132.

X. Related Proceedings Appendix

No related proceedings are known to the applicant.